



U.S. Department of Justice

United States Attorney
 Southern District of New York

50 Main Street, Suite 1100
 White Plains, New York 10606

August 21, 2024

VIA ECF

The Honorable Cathy Seibel
 United States District Court
 Southern District of New York
 300 Quarropas Street
 White Plains, New York 10601

Re: *United States v. Frank Butselaar, 22 Cr. 560 (CS)*

Dear Judge Seibel:

The parties write jointly regarding a proposed schedule for expert disclosure and attendant motion practice in this matter.

Based on discussions the parties have had, the defense anticipates noticing an expert. Pursuant to Fed. R. Crim. P. 16(b)(1)(C)(ii), the parties respectfully request that the Court order that any defense expert disclosure, pursuant to Rule 16, be made to the Government by September 3, 2024 and any motion to preclude by the Government be filed by September 24, 2024.

Very truly yours,

DAMIAN WILLIAMS
 United States Attorney

by: s/ _____

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 Shiva H. Logarajah
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 Assistant United States Attorneys
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Deadline for defense expert disclosure is 9/3/24.
 Government's motion to preclude due by
 9/24/24. Defendant's opposition due by
 10/1/24. Government's reply due by 10/4/24.

SO ORDERED.

08/21/24

CATHY SEIBEL, U.S.D.J.